

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**LARRY SAMMS**

**Plaintiff**

**v.**

**ABRAMS, FENSTERMAN,  
FENSTERMAN, EISMAN, FORMATO,  
FERRARA & WOLF, LLP**

**Defendant**

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**Case No.: 1:15-CV-02741-JSR**

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**PLAINTIFF’S NOTICE OF MOTION FOR SUMMARY JUDGMENT AS TO  
LIABILITY**

PLEASE TAKE NOTICE THAT, upon the accompanying: Declaration of Ahmad Keshavarz and annexed exhibits; Local Rule 56.1 Statement of Material Facts; Memorandum of Law, and upon all of the proceedings heretofore had herein, Plaintiff Larry Samms will move this Court before United States District Judge Jed S. Rakoff, located at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007-1312, at a time to be determined by the Court, for an Order granting Plaintiff’s aforesaid motion.

Dated: Brooklyn, NY

December 9, 2015

/s/

Ahmad Keshavarz

Respectfully submitted,

/s/

Ahmad Keshavarz

ATTORNEY FOR PLAINTIFF

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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Abrams, Fensterman, Fensterman,  
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Date: December 9, 2015  
Brooklyn, NY

/s/

Ahmad Keshavarz  
Plaintiff's Attorney